

EXHIBIT C

<p>1 2 UNITED STATES DISTRICT COURT 3 SOUTHERN DISTRICT OF NEW YORK 4 -----X 5 KRISTIN A. CARMODY, M.D., M.H.P.E., 6 7 Plaintiff, 8 9 -against- 21-CV-08186(LGS-DF) 10 11 NEW YORK UNIVERSITY; NYU GROSSMAN 12 SCHOOL OF MEDICINE; NYU LANGONE 13 HOSPITAL; ROBERT I GROSSMAN, M.D., FRITZ 14 FRANCOIS, M.D., STEVEN B. ABRAMSON, M.D.; 15 ANDREW BROTMAN, M.D.; and ROBERT J. 16 FEMIA, M.D., 17 18 Defendants. 19 20 -----X 21 June 21, 2022 22 10:05 a.m. 23 24 CONFIDENTIAL 25</p> <p>16 Videoconference deposition of KRISTIN 17 CARMODY, MD, taken by defendants, reported 18 remotely by Rita Persichetty, a Shorthand 19 Reporter and Notary Public of the State of 20 New York. 21 22 23 24 25</p>	<p>3</p> <p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED, by 5 and between counsel for the respective 6 parties hereto, that all objections, except 7 as to form, are reserved to the time of 8 trial. 9 IT IS FURTHER STIPULATED AND AGREED 10 that the deposition may be signed and sworn 11 to before any officer authorized to 12 administer an oath. 13 IT IS FURTHER STIPULATED AND AGREED 14 that the sealing and filing of the 15 deposition be waived. 16 17 18 19 20 21 22 23 24 25</p>
<p>2</p> <p>1 2 REMOTE APPEARANCES: 3 4 HOGUET NEWMAN REGAL & KENNEY 5 Attorneys for Plaintiff 6 One Grand Central Place 7 60 East 42nd Street 8 New York, New York 10165 9 BY: FIONA CARMODY, ESQ. 10 fcarmody@hnrklaw.com 11 WENDY TSANG, ESQ. 12 wtsang@hnrklaw.com 13 14 CERASIA LAW LLC 15 Attorneys for Defendants 16 One Liberty Plaza 17 165 Broadway, 23rd floor 18 New York, New York 10006 19 BY: EDWARD CERASIA II, ESQ. 20 ALISON TOMASCO, ESQ. 21 22 PRESENT: 23 DAN DRIESAN, Esq., NYU in-house counsel 24 ROB FEMIA, MD 25</p>	<p>4</p> <p>1 2 THE COURT REPORTER: The 3 attorneys participating in this 4 deposition acknowledge that I am not 5 physically present in the deposition 6 room and that I will be reporting this 7 deposition remotely. They further 8 acknowledge that, in lieu of an oath 9 administered in person, the witness 10 will verbally declare her testimony in 11 this matter is under penalty of 12 perjury. 13 The parties and their counsel 14 consent to this arrangement and waive 15 any objections to this manner of 16 reporting. 17 Please indicate your agreement by 18 stating your name and your agreement on 19 the record. 20 MR. CERASIA: Edward Cerasia, II 21 on behalf of the defendants and we 22 agree. 23 MS. CARMODY: And I'm Fiona 24 Carmody on behalf of plaintiff and I 25 also agree.</p>

1 Carmody - Confidential
 2 Q. Is that correct?
 3 MS. CARMODY: Same objection.
 4 Q. Do you understand my question?
 5 A. Repeat, please.
 6 Q. Sure.
 7 What you just described is the
 8 ACGME standard that's a minimum that a
 9 hospital can allow for, correct?
 10 A. Right. Indirectly supervising
 11 residents based on their level.
 12 Q. Right. It has to be at least
 13 what the ACGME prescribes?
 14 A. Correct. Correct.
 15 Q. All right. But my question was:
 16 Did you have any practice of personally
 17 introducing yourself to a patient if you
 18 had been contacted beforehand that the
 19 patient was coming in to the ER?
 20 It has nothing to do with
 21 practices or requirements, it's just
 22 whether you personally introduced yourself
 23 if you knew somebody was coming in to the
 24 ER.
 25 A. Yes, I usually introduced myself.

1 Carmody - Confidential
 2 Q. Do you know why you didn't this
 3 time?
 4 A. I was very busy, and I was
 5 carrying a very sick patient on my own
 6 without any resident on the case.
 7 Q. Though, did you, yourself, with
 8 respect to this patient treat her any
 9 differently because she was, as you call
 10 her, a VIP?
 11 A. No, I did not.
 12 Q. Now, if you look back at page
 13 seven again, this is the attestation signed
 14 by you on that date at 2:34 p.m. That's
 15 the same thing as what you talked about
 16 when you were called the, quote, cosigner?
 17 A. Correct.
 18 Q. And as I understand the Epic
 19 system, you have a -- essentially a drop
 20 down with respect to the attestation,
 21 right?
 22 Such that the attestation, before
 23 you type in a patient's name or a patient's
 24 name's inputted, would say, I performed a
 25 history and physical examination of blank

1 Carmody - Confidential
 2 and discussed her management with the
 3 resident on the treatment team, right?
 4 A. Correct.
 5 Q. Okay. Now, when that drop down
 6 came, did you have to put the patient's
 7 name in and the pronoun or was it done
 8 automatically by Epic?
 9 A. It's done automatically.
 10 Q. And did you understand that that
 11 attestation drop down could be edited?
 12 A. No.
 13 Q. You had no understanding that you
 14 had the ability to edit it?
 15 A. No. I was never told to edit it.
 16 I was never trained to edit it. No.
 17 Q. Were you trained to always make
 18 sure that medical records provide an
 19 accurate and true reflection of the care
 20 that you provided to a patient?
 21 A. Of course I was trained to
 22 document my charts to reflect the care that
 23 I provided for a patient, yes.
 24 Q. Okay. The statement that appears
 25 on page seven, quote, I performed a history

1 Carmody - Confidential
 2 and physical examination of -- patient,
 3 because the name's redacted -- and
 4 discussed her management with the resident
 5 on the treatment team, is not a true
 6 statement, is it?
 7 A. This was the only choice that we
 8 had. We had to sign this attestation on
 9 every single patient chart no matter what
 10 our involvement was. There was no choice
 11 in attestation. If you did not sign
 12 attestation as it was, billing and coding
 13 would contact you, would harass you to
 14 finish the chart. And if you didn't, you
 15 would be put on suspension.
 16 Q. Okay. Dr. Carmody, just answer
 17 my question. It is not a true statement
 18 with respect to this patient, correct?
 19 A. It is a true statement in the
 20 sense that I supervised the resident's
 21 history and physical examination.
 22 Q. Just listen to my question, okay.
 23 I understand what your claim is in this
 24 case but I would like you to answer my
 25 question.